

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION

No. 4:20-cr-79-130

UNITED STATES OF AMERICA )

v. )

ADRIENNE JEANINE WILLIAMS )  
\_\_\_\_\_ )

CRIMINAL INFORMATION

At all times relevant, the United States Attorney charges that:

1. The Defendant, **ADRIENNE JEANINE WILLIAMS**, was a resident of Rocky Mount, North Carolina, within the Eastern District of North Carolina.
2. **WILLIAMS** was the owner and operator of Ultimate Tax Service, a tax preparation business, which was located in Rocky Mount, North Carolina, within the Eastern District of North Carolina.
3. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the United States.
4. An Electronic Filing Identification Number ("EFIN") was a unique number issued by the IRS to individuals or firms that had been approved as Authorized IRS e-File providers.
5. A Preparer Tax Identification Number ("PTIN") was a unique number issued by the IRS to paid tax return preparers.

6. IRS Forms 1099 were used to report various non-salary income distributions and payments of taxes through withholdings.

7. Beginning no later than in or around November 2009, and continuing up to and through in or about April 2017, within the Eastern District of North Carolina and elsewhere, **WILLIAMS**, Co-Conspirator 1, Co-Conspirator 2, and others did knowingly and intentionally conspire, combine, confederate, and agree together and with each other to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS in the ascertainment, computation, assessment, and collection of federal income taxes.

#### **MANNER AND MEANS OF THE CONSPIRACY**

8. It was part of the conspiracy that **WILLIAMS**, in order to enrich herself and others, aided and assisted in the filing of false United States Individual Tax Returns (IRS Forms 1040, 1040A, and 1040EZ), which claimed false tax refunds to which the taxpayers were not entitled to receive.

9. It was further part of the conspiracy that **WILLIAMS** trained UTS employees, including Co-Conspirators 1 and 2, how to prepare false United States Individual Tax Returns by including false federal income tax withholdings on Forms 1099, among other false items, to generate fraudulent refunds.

#### **OVERT ACTS OF THE CONSPIRACY**

10. On or about November 16, 2009, **WILLIAMS** caused an EFIN ending 1387 in the business name of Ultimate Tax Service to be issued in the name of **WILLIAMS**, which **WILLIAMS** and others then used to file false tax returns.

11. On or about December 16, 2010, **WILLIAMS** caused the renewal of Ultimate Tax Service's subscription to Drake Software's tax preparation software, in the business name of Ultimate Tax Service to be issued in the name of **WILLIAMS**, which **WILLIAMS** and others then used to file false tax returns.

12. On or about February 18, 2014 and January 20, 2015, **WILLIAMS** caused the opening of checking accounts ending 7981 and 0703 at Woodforest National Bank to receive payment for assisting others in the filing of false tax returns.

13. On or about the dates listed below, **WILLIAMS**, Co-Conspirator 1, Co-Conspirator 2, and others, caused the filing of false United States Individual Income Tax Return (Forms 1040, 1040A, and 1040EZ) for the following taxpayers that were false and fraudulent as to a material matter:

OVERT ACT	TAXPAYER	APPROXIMATE DATE OF FILING	TAX YEAR	FALSE ITEM
A.	C.M.	02/14/2012	2011	Form 1040, line 62
B.	C.M.	03/04/2013	2012	Form 1040EZ, line 7
C.	C.M.	02/09/2014	2013	Form 1040, line 62
D.	C.M.	02/09/2015	2014	Form 1040, line 64
E.	C.M.	02/21/2016	2015	Form 1040, line 64
F.	R.J.	02/11/2014	2013	Form 1040, line 62
G.	R.J.	02/02/2015	2014	Form 1040, line 64
H.	R.J.	01/26/2016	2015	Form 1040, line 64
I.	R.J.	02/06/2017	2016	Form 1040, line 64
J.	J.H.	01/26/2012	2011	Form 1040A, line 7
K.	J.H.	01/29/2013	2012	Form 1040A, line 36
L.	J.H.	01/24/2014	2013	Form 1040A, line 36
M.	J.H.	01/15/2015	2014	Form 1040A, line 40
N.	J.H.	01/18/2016	2015	Form 1040A, line 40
O.	J.H.	01/23/2017	2016	Form 1040A, line 40
P.	P.M.	03/23/2013	2012	Form 1040EZ, line 7

Q.	P.M.	02/19/2014	2013	Form 1040A, line 36
S.	P.M.	03/10/2015	2014	Form 1040EZ, line 7
T.	P.M.	02/02/2016	2015	Form 1040A, line 40
U.	V.D.	04/04/2013	2012	Form 1040, line 62
V.	V.D.	02/03/2014	2013	Form 1040, line 62
W.	V.D.	02/10/2015	2014	Form 1040, line 64
X.	V.D.	02/09/2016	2015	Form 1040, line 64
Y.	J.L.	03/13/2015	2014	Form 1040A, line 40
Z.	J.L.	02/06/2016	2015	Form 1040A, line 40
AA.	J.L.	02/08/2017	2016	Form 1040A, line 40
AB.	F.H.	02/06/2013	2012	Form 1040EZ, line 7
AC.	F.H.	04/07/2014	2013	Form 1040A, line 36
AD.	F.H.	02/25/2015	2014	Form 1040, line 64
AE.	F.H.	01/26/2016	2015	Form 1040, line 64
AF.	F.H.	02/20/2017	2016	Form 1040, line 64
AG.	M.L.	02/18/2012	2011	Form 1040A, line 36
AH.	M.L.	01/29/2013	2012	Form 1040, line 62
AI.	M.L.	02/09/2014	2013	Form 1040A, line 36
AJ.	M.L.	02/08/2015	2014	Form 1040A, line 40
AK.	M.L.	02/04/2016	2015	Form 1040A, line 40
AL.	M.L.	02/07/2017	2016	Form 1040A, line 40
AM.	S.F.	02/28/2014	2013	Form 1040A, line 36
AN.	S.F.	02/05/2015	2014	Form 1040A, line 40
AO.	S.F.	01/30/2016	2015	Form 1040A, line 40
AP.	S.F.	02/16/2017	2016	Form 1040A, line 40

In violation of Title 18, United States Code, Section 371.

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BY:

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